

Paula Wilson

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Sent: Friday, June 18, 2010 8:37 AM
To: Paula Wilson; Martin Bauer; Lisa Carlson
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Subject: Comment on Rule Docket No. 58-0101-0904

Attachments: Negotiated Rule Draft No 5.docx

P4 Production, LLC (P4) thanks the Idaho Department of Environmental Quality for the opportunity to comment on Negotiated Mercury Rule Draft No. 5 in Docket No. 58-0101-0904. P4's comments are limited to clarification of a sentence in the definitions Section 006.XX to reflect the intent of DEQ's intentions expressed during the negotiated rulemaking sessions. Please see the attachment for the suggested changes.

Respectfully Submitted,

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06/21/2010

Negotiated Rule Draft No. 5
Docket No. 58-0101-0904 – Mercury Emissions
Dated June 15, 2010
Written comment deadline for this draft – June 21, 2010

006. GENERAL DEFINITIONS.

XX. Mercury Best Available Control Technology (MBACT). An emission standard limit for mercury based on the maximum degree of reduction practically achievable as specified by the Department on an individual case-by-case basis taking into account energy, economic and environmental impacts, and other relevant impacts specific to the source. A Department approved MBACT determination shall be valid ~~for a period of ten (10) years or until~~ such time that the source is modified, whichever is later after a period of ten (10) years from the preceding MBACT determination. A proposed modification to the stationary source subject to MBACT shall not trigger a new MBACT review unless the proposed modified source could not meet the existing MBACT requirements.